

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

L.B. and through Next Friend
JUDITH BURK

Plaintiff,

vs.

MISSOURI DEPARTMENT OF
CORRECTIONS, et al.,

Defendants.

Case No.: 4:08-CV-02000 CDP

**PLAINTIFF'S SUPPLEMENTAL ANSWER TO EXPERT INTERROGATORY
AND RULE 26 (a) (2) DISCLOSURE OF EXPERT WITNESS**

Comes Now, Plaintiff and for her Supplemental Answer to Defendant's

Interrogatory and Rule 26(a)(2) Expert Disclosure, states as follows:

9. Identify each person by name, address, occupation, place of employment and qualifications to give an opinion, who the plaintiff expects to call as an expert witness with respect to any aspect of the suit and state the general nature of the subject matter on which the expert is expected to testify, and the expert's hourly fee. [The expert's curriculum vitae may be attached to the Interrogatory Answers in lieu of state the qualifications of the expert to give an opinion is such information is available on the expert's curriculum vitae.]

Dr. Matthew Bosner M.D., West County Lipid Cardiac Center, 29 Spoede Lane, St. Louis, Missouri, 63141. Dr. Bosner is expected to testify that Correctional Medical Services Inc., physician and nursing staff were aware of Plaintiff's deceased, Douglas Burk, cardiac condition and deviated from the standard of care; and that the deliberate denial of care and delay in care was directly related to the cardiac arrest and death of Douglas Burk on December 30, 2005. See attached report for a complete statement of Dr. Bosner's opinions and the basis therefore. Dr. Bosner's curriculum vitae, fee schedule, and list of cases in which he has testified within the past four years are also attached thereto.

Plaintiff reserves the right to call any expert witness retained and/or disclosed by the defendant for any of the reasons mentioned herein.

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CERTIFICATE OF SERVICE

A copy of the foregoing mailed this 7th day of May, 2010, to Peter J. Dunne and Jessica L. Liss, Rabbitt, Pitzer & Snodgrass, Attorneys for the Defendant Correctional Medical Services, 100 South Fourth Street, Suite 400, St. Louis, Missouri, 63102.


Attorney for Plaintiffs